

**REMARKS**

This Amendment is filed in response to the Office Action mailed December 21, 2007. All objections and rejections are respectfully traversed.

Claims 29-62 are in the case.

Claims 52-62 have been added.

Claims 29, 31, 34, 40, 42, and 51 have been amended.

**Request for Interview**

The undersigned respectfully requests a telephonic interview with the Examiner after the Examiner has had an opportunity to consider this Amendment, but before the issuance of the next Office Action. The undersigned may be reached at 617-951-2500.

**Rejections Under 35 U.S.C. § 112**

At paragraph 4 of the Office Action, the Examiner rejected claim 51 under 35 U.S.C. § 112, paragraph 2 as being indefinite.

Applicant respectfully notes that claim 51 is already presented in the form suggested by Examiner. Accordingly, Applicant believes that claim 51 is in condition for allowance.

**Rejections Under 35 U.S.C. § 102**

At paragraph 5-6 of the Office Action, claims 29-51 were rejected under 35 U.S.C. § 102(e) as being unpatentable in view of Kumar et al., U.S. Publication No. 2003/0131182 published on July 10, 2003 (hereinafter “Kumar”).

Applicant’s claimed novel invention, as set forth in representative claim 29, comprises in part:

29. A method for accessing a data storage system, comprising:
- maintaining a virtual logical unit assigned to one or more specific clients;*
  - receiving a log in request from a first specific client, the log in request directed to the virtual logical unit;*
  - generating, in response to the log in request, a first logical unit number map (lun map), from the virtual logical unit to one or more physical logical units, the first specific client having permission to access the physical logical units mapped by the first lun map, the first lun map presenting one or more client specific lun numbers, accessible solely by the first specific client, mapped to one or more physical lun numbers utilized by the storage operating system;*
  - exporting the client specific lun numbers to the first specific client; and*
  - receiving a data access request from the first specific client, the request directed to a selected client specific lun in the first lun map, and translating the client specific lun into a selected physical lun number, the physical lun number accessing the physical logical unit supporting the client specific lun.*

Kumar teaches a mapping function by maintaining a lun map at a central location. The lun map is created before receiving a data access request. Also, the lun map is periodically distributed to the appropriate network devices (e.g., virtualization ports) (Kumar, [0098]). Further, Kumar’s lun map contains lun numbers for a plurality of clients (Fig. 12, [94-97]).

Applicant respectfully urges that Kumar does not disclose Applicant's claimed novel *maintaining a virtual logical unit assigned to one or more specific clients;*

*receiving a log in request from a first specific client, the log in request directed to the virtual logical unit;*

*generating, in response to the log in request, a first logical unit number map (lun map), from the virtual logical unit to one or more physical logical units, the first specific client having permission to access the physical logical units mapped by the first lun map, the first lun map presenting one or more client specific lun numbers, accessible solely by the first specific client, mapped to one or more physical lun numbers utilized by the storage operating system;*

*exporting the client specific lun numbers to the first specific client; and*

*receiving a data access request from the first specific client, the request directed to a selected client specific lun in the first lun map, and translating the client specific lun into a selected physical lun number, the physical lun number accessing the physical logical unit supporting the client specific lun.*

In sharp contrast to Kumar, Applicant's claimed novel invention recites *receiving a log in request...generating, in response to the log in request, a first logical unit number map (lun map)...and exporting the client specific lun numbers to the first specific client.*

Applicant generates a client specific lun map in response to the client log in request. By comparison, Kumar has already created a lun map which is stored at a central location such as the virtual enclosure server. Moreover, Applicant exports the lun numbers to a specific client, whereas Kumar periodically distributes it to the appropriate network devices (e.g., virtualization ports).

Additionally, Applicant's claimed lun map is client specific. This is distinct from Kumar which has a lun mapping table used to identify each initiator (e.g., host, client etc.) ([Kumar; [0096]). As such, Kumar must search all clients for each data request to identify which enclosure ports are available to each client (Kumar; [0096]).

Accordingly, Applicant respectfully urges that the Kumar publication is legally precluded from anticipating the claimed invention under 35 U.S.C. § 102 or 35 U.S.C. § 103 because of the absence from the Kumar publication of Applicant's claimed novel use of *maintaining a virtual logical unit assigned to one or more specific clients;*

*receiving a log in request from a first specific client, the log in request directed to the virtual logical unit;*

*generating, in response to the log in request, a first logical unit number map (lun map), from the virtual logical unit to one or more physical logical units, the first specific client having permission to access the physical logical units mapped by the first lun map, the first lun map presenting one or more client specific lun numbers, accessible solely by the first specific client, mapped to one or more physical lun numbers utilized by the storage operating system;*

*exporting the client specific lun numbers to the first specific client; and*

*receiving a data access request from the first specific client, the request directed to a selected client specific lun in the first lun map, and translating the client specific lun into a selected physical lun number, the physical lun number accessing the physical logical unit supporting the client specific lun.*

#### New Claims

New claims 52-62 were added and are believed to be in condition for allowance.

Applicant's claimed novel invention, as set forth in representative new claim 52, comprises in part:

52. A method for accessing a data storage system, comprising:  
*logging into the data storage system by a client;*  
*generating a logical unit number map (lun map) for one or more physical logical units the client is permitted to access, the lun map excluding mapping of physical logical units the client is not permitted to access;*  
*exporting the lun map to the client; and*  
*receiving a data access request from the client for data on a lun mapped by the lun map.*

Applicant respectfully urges that Kumar does not disclose Applicant's claimed novel *logging into the data storage system by a client;*

*generating a logical unit number map (lun map) for one or more physical logical units the client is permitted to access, the lun map excluding mapping of physical logical units the client is not permitted to access;*

*exporting the lun map to the client; and*

*receiving a data access request from the client for data on a lun mapped by the lun map.*

As noted above, Kumar has a previously generated lun mapping table used to identify each initiator (e.g., host, client etc.), where Applicant generates a lun map *for one or more physical logical units the client is permitted to access, the lun map excluding mapping of physical logical units the client is not permitted to access.*

Accordingly, Applicant respectfully urges that the Kumar publication is legally precluded from anticipating the claimed invention under 35 U.S.C. § 102 because of the absence from Kumar of Applicant's claimed novel use of *logging into the data storage*

*system by a client;*

*generating a logical unit number map (lun map) for one or more physical logical units the client is permitted to access, the lun map excluding mapping of physical logical units the client is not permitted to access;*

*exporting the lun map to the client; and*

*receiving a data access request from the client for data on a lun mapped by the lun map.*

All independent claims are believed to be in condition for allowance.

All dependent claims are believed to be dependent from allowable independent claims, and therefore in condition for allowance.

Favorable action is respectfully solicited.

Please charge any additional fee occasioned by this paper to our Deposit Account No. 03-1237.

Respectfully submitted,

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